

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

)	Chapter 11
In re:)	
)	Case No. 24-11967 (JKS)
BIG LOTS, INC., et al., ¹)	
)	(Jointly Administered)
Debtors.)	
)	Re: D.I. 2178, 2293

**NOTICE OF 1255 SUNRISE REALTY, LLC INTENT TO OFFER
WITNESS TESTIMONY AT THE HEARING SCHEDULED FOR APRIL
2, 2025, AT 9:30 A.M. (ET)**

Undersigned counsel for 1255 Sunrise Realty, LLC (“1255 Sunrise”) hereby submits this notice of intent to offer witness testimony (the “Notice”) in connection with the hearing on April 2, 2025, at 9:30 A.M. (prevailing Eastern Time) in the above-captioned case as follows:

Name	Scope of Testimony
James Butsikares Manager, George Butsikaris Realty Inc., Property Manager for 1255 Sunrise Realty LLC Member, 1255 Sunrise, Realty LLC	Lack of adequate assurance of future performance; lease is for real property within a “shopping center”; calculation of cure amount. <i>Relating to Objection of 1255 Sunrise Realty, LLC to Debtors’ Proposed Assumption and Assignment of its Unexpired Lease in Eighteenth Post-Closing Designation Notice (D.I. 2293).</i>
Sam Dushey (Adverse Witness)	Lack of adequate assurance of future performance
Robert A. Rich Hunton Andrews Kurth LLP Counsel for Landlord, 1255 Sunrise Realty, LLC	Authentication of email correspondence

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin Granville Road, Columbus, OH 43081.

Any witness listed on any other Witness List filed by any other party in this contested matter	
Any rebuttal and/or impeachment witnesses	

1255 Sunrise reserves the right to further amend or supplement this witness list at or prior to the hearing, to call any witness designated by any other party, and to introduce into evidence any documents or exhibits designated by any other party.

WHEREFORE, should this Honorable Court have any questions or concerns regarding this Notice, counsel is available at the earliest convenience of the Court to address them.

Dated: March 31, 2025
Wilmington, Delaware

GELLERT SEITZ BUSENKELL & BROWN, LLC

/s/ Michael Busenkell
Michael Busenkell (DE 3933)
1201 N. Orange Street, Suite 300
Wilmington, DE 19801
Telephone: 302-425-5812
Facsimile: 302-425-5814
Email: mbusenkell@gsbblaw.com

-and-

HUNTON ANDREWS KURTH LLP
Gregory G. Hesse (DE 005710)
Fountain Place
1445 Ross Avenue, Suite 3700
Dallas, TX 75202
Telephone: (214) 979-3000
Email: ghesse@hunton.com

Robert A. Rich (admitted *pro hac vice*)
200 Park Avenue
New York, NY 10166
Telephone: 212-309-1132
Email: rrich@hunton.com

Counsel to 1255 Sunrise Realty, LLC